

Marsha Mason Thies, Recorded among \*  
The Land Records of Frederick County\*  
Maryland at Liber 1261, Folio 268. \*

Defendants \*

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# COMPLAINT TO QUIET TITLE

COME NOW the Plaintiffs, John Peter Thies and Marsha Mason Thies, by their attorneys, Russell T. Horman and James R. Shoemaker, and as grounds for their Complaint to Quiet Title, state as follows:

1. That by a Deed dated October 31, 1984, from William D. Miller to John Peter Thies and Marsha Mason Thies, and recorded among the Land Records of Frederick County, Maryland, in Liber 1261, folio 268, the Plaintiffs are fee simple owners of all that property in Creagerstown Election District, Frederick County, Maryland, known as 11801 Hunt Club Road, and more particularly described in Exhibit 1 hereto, which is herein incorporated by this reference.

2. That Attachment A to the aforesaid Deed describes the said property as two parcels, Parcel A and Parcel B. The said Attachment A is also attached as Exhibit 1 hereto and incorporated herein.

3. That as Exhibit 1 hereto shows, the said Parcel B, containing approximately .488 acres, is described in Attachment A to the aforesaid Deed as a "parcel of apparent long possession adjoining ...Parcel A."

4. That an unrecorded plat dated January 21, 1981, prepared by Sutcliffe & Associates, Inc., shows the said Parcel B containing .488 acres, more or less, and indicates that Parcel B is owned "by possession." A copy of the pertinent portion of said plat is attached as Exhibit 2 and incorporated herein.

5. That Plaintiffs' counsel, Russell T. Horman and James R. Shoemaker, are of the opinion that the aforesaid Deed and plat descriptions of Parcel B indicate that there is a defect in the Plaintiffs' title to said Parcel B.